

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE NON JUDICIAL CIVIL FORFEITURE :  
PROCEEDING REGARDING \$100,000 IN :  
UNITED STATES CURRENCY SEIZED ON :  
OR ABOUT OCTOBER 19, 2021 :  
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STIPULATION AND ORDER

23 Misc. 260

WHEREAS, on or about October 19, 2021, the Drug Enforcement Administration (“DEA”) seized \$100,000 in United States currency from Wei Zheng (the “Seized Currency”);

WHEREAS, on or about January 25, 2022, the DEA initiated an administrative forfeiture proceeding against the Seized Currency pursuant to Title 21, United States Code, Section 881, by timely sending written notice of its intent to forfeit the Seized Currency to all known interested parties;

WHEREAS, on or about January 3, 2022, the DEA received a claim from Wei Zheng (the “Claimant”) asserting an interest in the Seized Currency;

WHEREAS, the DEA subsequently referred the matter to the United States Attorney’s Office, Southern District of New York for judicial forfeiture;

WHEREAS, Western Union Financial Services Inc. (“Western Union”) has advised the Government of an interest in the Seized Currency;

WHEREAS, other than Claimant and Western Union, no other party has claimed an interest in the Seized Currency;

WHEREAS, the Claimant, by and through his counsel, Heng Wang, Esq., and Western Union, by and through its counsel, Sharon Cohen Levin, Esq., have provided the Government with documentation relating to their respective interests in the Seized Currency; and

WHEREAS, the Government, the Claimant, and Western Union, have agreed to

settle this matter without further litigation;

NOW, THEREFORE, IT IS HEREBY STIPULATED, AGREED AND ORDERED, by and between Damian Williams, United States Attorney for the Southern District of New York, by and through Assistant United States Attorney Tara La Morte, of counsel, and the Claimant, by and through his attorney Heng Wang, Esq., and Western Union, by and through its counsel Sharon Cohen Levin, Esq., that:

1. The United States Marshals Service shall return \$91,258.09 of the Seized Currency to Western Union in a manner consistent with the United States Marshals Service Automated Clearing House ("ACH") Form to be completed by Western Union through its attorney, Sharon Cohen Levin, Esq.

2. The United States Marshals Service shall return the remainder of the Seized Currency, specifically, \$8,741.91 to the Claimant in a manner consistent with the United States Marshals Service Automated Clearing House ("ACH") Form to be completed by the Claimant through his attorney, Heng Wang, Esq.

3. The Government's agreement to this Stipulation and Order is expressly premised upon the truthfulness, accuracy and completeness in every material part of the representations made by the Claimant and Western Union and their counsel.

4. Claimant and Western Union are hereby barred from asserting, or assisting others in asserting, any claim against the United States Attorney's Office for the Southern District of New York ("USAO-SDNY"), the Department of Justice ("DOJ"), the Drug Enforcement Administration ("DEA"), the United States Marshals Service ("USMS") or agents and employees of the USAO-SDNY, the DOJ, DEA, and the USMS in connection with the seizure and/or

possession of the Seized Currency, including but not limited to any claim that there was no probable cause to seize and hold the Seized Currency, or for costs or attorney's fees.

5. The parties hereby waive all rights to challenge or contest the validity of this Stipulation and Order.

6. Further, this Stipulation and Order shall in no way constitute any reflection upon the merits of any petition, claim and/or defenses that may be asserted respectively by the United States and the Claimant.

7. This Stipulation and Order constitutes the complete agreement of the parties and may not be amended without express written authorization from all parties.

8. This Court shall have exclusive jurisdiction over the interpretation and enforcement of this Stipulation and Order.

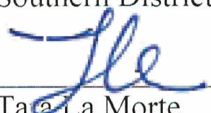
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9. The signature page of this Stipulation and Order may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

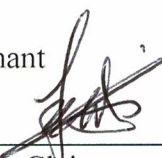
DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

By:

  
Tara La Morte  
Assistant United States Attorney  
One St. Andrew's Plaza  
New York, New York 10007  
(212) 637-1041

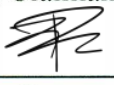
August 3, 2023  
DATE

Wei Zheng, Claimant

  
Wei Zheng, Claimant

August 2, 2023  
DATE


By:

  
Heng Wang, Esq.  
305 Broadway, 7<sup>th</sup> Floor  
New York, New York 10007  
Attorney for Claimant, Wei Zheng

August 2, 2023  
DATE

WESTERN UNION FINANCIAL SERVICES INC.

By:

  
Sharon Cohen Levin, Esq.  
Sullivan & Cromwell LLP  
125 Broad Street  
New York, NY 10004-2498  
Attorney for Western Union Financial Services Inc.

July 20, 2023  
DATE

SO ORDERED:

\_\_\_\_\_  
HON.  
UNITED STATES DISTRICT JUDGE

\_\_\_\_\_  
DATE